

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

MARTIN J. WALSH,
SECRETARY OF LABOR,
UNITED STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

MEDICAL STAFFING OF AMERICA, LLC, a limited liability company, d/b/a STEADFAST MEDICAL STAFFING, and LISA ANN PITTS, individually and as owner and officer of the aforementioned company, Defendants.

Case No. 2:18-cv-226

Case No. 2:19-cv-475

NOTICE OF APPEAL

Notice is hereby given that Defendants Medical Staffing of America, LLC d/b/a Steadfast Medical Staffing, and Lisa Ann Pitts (collectively “Defendants”) appeal to the United States Court of Appeals for the Fourth Circuit from the Order and Judgment entered on January 14, 2022 (Dkt. Nos. 324, 325) in favor of the U.S. Department of Labor, and all earlier adverse interlocutory orders and rulings subsumed into that judgment. Defendants acknowledge that the District Court has not yet entered a final judgment with a dollar amount. Defendants file this Notice of Appeal now in an abundance of caution, recognizing that premature notices of appeal are proper. See Fed. R. App. P. 4(a)(2). Defendants expect to amend this Notice of Appeal and seek to pursue a single combined appeal once proceedings are complete in the District Court.

/s/ Julia A. Rust

Abram J. Pafford (VSB No. 79999)
McGuireWoods LLP
888 16th Street NW
Black Lives Matter Plaza
Suite 500
Washington, D.C. 20006
Tel: 202-857-1725
Fax: 202-828-3350
apafford@mcguirewoods.com

Joshua L. Jewett (VSB No. 76884)
Julia A. Rust (VSB No. 87270)
Pierce / McCoy, PLLC
101 West Main Street, Suite 101
Norfolk, VA 23510
Tel: (757) 216-0226
Fax: (757) 257-0387
jjewett@piercemccoy.com
julia@piercemccoy.com

*Counsel for Defendants Medical Staffing of America,
LLC d/b/a Steadfast Medical Staffing, and Lisa Ann
Pitts*

CERTIFICATE OF SERVICE

I certify that on March 14, 2022 I filed the foregoing document which provided notice to the following counsel of record:

Ryma Lewis (VSB No. 83322)
Chervonti Jones (*pro hac vice*)
Mohamed E. Seifeldein (VSB No. 84424)
Office of the Regional Solicitor
U.S. Department of Labor
201 12th Street South, Suite 401
Arlington, VA 22202
Telephone: (202) 693-9393
Facsimile: (202) 693-9392
lewis.ryma@dol.gov
jones.chervonti.j@dol.gov
seifeldein.mohamed.e@dol.gov

/s/ Julia A. Rust
Julia A. Rust, Esq.

156929605_1